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**IN THE UNITED STATES DISTRICT COURT FOR
THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

DONNA CURLING, et al.

Plaintiff,

vs.

BRAD RAFFENSPERGER, et al.

Defendant.

**CIVIL ACTION FILE NO.: 1:17-cv-
2989-AT**

SUPPLEMENTAL DECLARATION OF RHONDA J. MARTIN

RHONDA J. MARTIN declares, under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I have personal knowledge of all facts stated in this declaration and, if called to testify, I could and would testify competently thereto.
2. This declaration supplements my Declarations of May 20, 2019 (Doc. 413, Ex. C); December 16, 2019 (Doc. 680, Ex. L); March 4, 2020 (Doc. 716, Ex. 3); March 10, 2020 (Doc. 723, Ex. J); and August 23, 2020 (Doc. 809, Ex. 3).

3. I am Executive Secretary for the Qatar Computing Research Institute Scientific Advisory Committee, and a board member of the Coalition for Good Governance. I have developed avionics software for the Space Shuttle and worked with the Department of Defense to develop guidance and policy for the testing of computer software for mission-critical applications. I have also taught AP Statistics and other Upper School level mathematics courses. I have an M.S. in Operations Research and a B.S. in Applied Mathematics from Georgia Institute of Technology, and Teaching Certification in Math Education Major/Science Education Minor from Purdue University.
4. Growing up, I learned to treasure my right to vote and my right to a secret ballot. I was raised by my grandparents, neither one of which had a high school education. My grandmother read the newspaper every day and my grandfather watched the news every evening. When it came time to vote, my grandmother put on one of the two nice dresses she owned and went and voted. She would never tell my grandfather who or what she voted for because she didn't have to. There has never been a question in my mind: when there is an election in which I am eligible to vote, I will vote. I do not see this changing in the future.

5. In general, my preference would be to vote in person on a hand marked secret ballot at my neighborhood precinct on Election Day, joining in the social experience of seeing my neighbors and engaging with them in the demonstration of civic engagement. Voting on Election Day also gives me the benefit of having all the most current news about candidates before I cast my ballot. Also, voting on Election Day provides more physical security of my vote, as it assures that my ballot and the scanner memory card will be transported to the Fulton office that evening and not be left sitting in the scanner in poorly secured conditions in the early voting public polling places night after night during early voting. I am a frequent poll watcher and familiar with the lax security in the early voting locations and the ease with which memory cards and ballots can often be accessed in malicious ways.
6. Due to concerns about the potential of the Ballot Marking Device electronic voting machines not properly recording my vote, the complete lack of privacy when using the Ballot Marking Devices given their size and upright design, and the dangers of COVID, I now accept the inconvenience of voting by mail ballot deposited in a Fulton County drop box and recommend the same practice to family and friends.

7. For these reasons, on April 6, 2020, I completed the Application for Official Absentee Ballot that I received in the mail for what ended up being the June 9, 2020 Presidential Preference Primary and General Primary, scanned it, and emailed it to elections.voterregistration@fultoncountyga.gov.
8. My daughter, Cara Martin DeMillo, also member of Coalition for Good Governance, completed her Application for Absentee Ballot on April 7, 2020. I scanned it and emailed it to elections.voterregistration@fultoncountyga.gov on that same day.
9. After emailing our applications, I checked our My Voter Pages to see the status of our absentee ballot applications at least once every day, often multiple times, but our applications did not show as having been received. I continued this monitoring exercise for us from early April until early June – a very stressful 2 months.
10. Out of concern that our applications were not received, I was often tempted to mail in the original of our ballot applications via the USPS but feared that it could delay processing further if Fulton County discovered that it had duplicate applications from me and my daughter. I understood from press reports that Fulton County was over 100,000 applications

behind in processing and assumed that our applications were in the backlog.

11.Eventually, My Voter Page was updated to show that my absentee ballot was issued on May 26, 2020. The time stamp on the envelope actually indicated that it was sent on May 30, 2020 (day 150 of 2020). I received it on June 4, 2020. This allowed little time to complete and return the ballot, and even less time to allow for the correction of any alleged discrepancies or signature mismatches should they have arisen. I definitely felt that my vote was in peril.

12.My daughter's absentee ballot for the June 9, 2020 election was never received. She did not vote in the June 9, 2020, election due to fears that her votes would not be recorded correctly and that she would contract COVID by voting in person, interacting with numerous pieces of equipment that had been touched by many other people for an extended period of time due to the lengthy ballot.

13.My review of the sample ballot on My Voter Page indicated that she would have had approximately 48 ballot selections to make. I can't imagine how long it would take her to indicate her choices, review them on the summary screen, print out her ballot summary, and then attempt to

verify that the printed summary (in small font) accurately recorded her votes.

14. She told me that there was no way she could remember all of the races on the ballot to verify that the Ballot Marking Device ballot summary printout was accurate and complete, so she would have to bring a completed sample ballot with her for reference as she attempted to complete the process of voting and then verifying that the machine correctly printed the text of her 48 choices.

15. She told me that she was also worried that trying to handle additional papers while she voted would cause her to touch more surfaces on and around the Ballot Marking Device and risk additional exposure.

16. Finally, she told me that she didn't know what cleaning procedures would be followed in the polling places and how it would be possible to safely interact with a Ballot Marking Device in the age of the coronavirus. Unfortunately, I could not offer any information or assurance.

17. I told her that I have observed in many poll watching experiences that the multi-step voting process on the Ballot Marking Device would require significantly longer than hand marking a paper ballot in a one step

process where no tedious time-consuming verification of machine text printing accuracy is required.

18. Further, I informed her that the check-in process would require that she complete the time-consuming process of submitting an affidavit indicating that she did not receive her absentee ballot, further increasing her risk of being exposed to the coronavirus if she voted in person.

19. For the August 11, 2020, General Primary Runoff election, on July 28, 2020 following the instructions in the Your Voice Your Vote mailing sent out by Fulton County, I attached my completed absentee ballot application as a 1.4 MB pdf to an email and sent it to elections.voterregistration@fultoncountyga.gov.

20. I immediately received a response from Elections.Voter Registration with the subject line: OUT OF OFFICE. It said: We have received your email. To submit an absentee ballot application via email, attach the application as a .pdf or .jpg between 1 MB and 5 MB. The message confused me, given that I had just done exactly that!

21. It took until August 7, 2020 for My Voter Page to show that my application had been received on August 6 and that my ballot would be issued on August 8. I never received my ballot and was therefore

required to vote in person using an unauditable Ballot Marking Device, unless I wanted to forfeit my right to vote.

22. For the November 3, 2020 General Election and the January 5, 2021

General Election Runoff Election, my daughter and I successfully requested, received, and voted using absentee mail ballots. Although the process worked to permit us to cast our ballots, given my previous experiences, I suffered an unreasonable amount of stress and frustration involved with constantly checking our My Voter Pages to see if our applications had been received, if our ballots had been issued, and if they had been accepted. Even after seeing that they were accepted, I continued to check the My Voter Pages to make sure nothing went wrong later since, as part of our work with voters at Coalition for Good Governance, I had heard of ballots being accepted and later rejected.

23. Furthermore, there was also a fair amount of stress involved in deciding

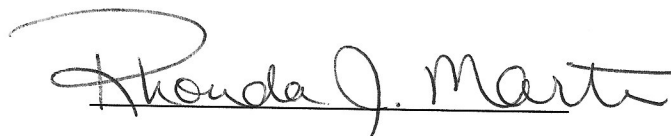
exactly when to submit our ballots via the drop box near our home. I didn't want to wait until too late and have them lost in the last minute crush, but I also didn't want to vote too early based on incomplete information about candidates in fluid contests. I am also aware that it is illegal for me to wait until Election Day to vote my mail ballot, having

received warnings not to vote my ballot on Election Day in my Fulton County mail ballot packets. (Exhibit 1)

24. I treasure my right to vote, my right to have my vote counted as intended, and my right to a secret ballot. There should not be a need to strategize about how best to have these rights preserved. Having the option to vote in person using a Hand Marked Paper Ballot so that I know my intentions are clearly communicated and my ballot's secrecy is preserved is of utmost importance to me.

25. As a board member of the Coalition for Good Governance, I am concerned by the requirement to divert the majority of our resources to cover the costs of litigation in the Curling case. Of high priority, and by necessity relegated to the back burner, is a revamping of the CGG website so that it provides a complete history of the activities of the organization, and offers easy access to materials that could prove useful to groups with similar goals and interests.

Executed on this date, February 12, 2021.

A handwritten signature in black ink, reading "Rhonda J. Martin". The signature is written in a cursive style with a large, looping initial "R".

Rhonda J. Martin